

**REMARKS**

Reconsideration and withdrawal of all grounds of rejection are respectfully in light of the above amendments and following remarks. Claims 1-8, as shown above, remain pending herein.

At the outset, Applicants note with appreciation the indication in the Office Action that 2, 4 and 5 recite allowable subject matter and would be allowed if rewritten in an independent format including all the limitations of its base claim and any intervening claims.

Applicants have submitted revised copies of Figs. 1, 7 and 8 for approval. We have also resubmitted Figs. 5 and 6 because the Office Action requested labeling of these figures as well. We note that the branches shown in Figs. 5 and 6 are binary trees of a shot merging step and their values are already labeled in the boxes. If you want us to somehow revise Figs. 5 and 6, please let us know and we will comply.

(1) Claim 3 stands being objected to for referencing "said sub-division step".

Applicants have amended claim 3 to overcome this ground of rejections. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

(2) Claims 1, 3, 6 and 7 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Ratakonda (U.S. 5,956,026). Applicants respectfully traverse this ground of rejection for the reasons indicated herein below.

Applicants have amended claim 1 to clarify that the partitioning of each individual shot into micro-segments comprising a plurality of temporal sub-entities, each of the micro-segments having a level of homogeneity computed on a motion histogram.

The Office Action refers to Ratakonda as disclosing the shots are subdivided into keyframes, and alleges that keyframes and micro-segments are one in the same, i.e. a division of a shot. Applicants respectfully disagree that micro-segments and keyframes are interchangeable entities, nor does the disclosure of one obviate the use of the other, particularly since a “micro-segment” is a phrase coined by the inventors of the instant application to describe a new type of partitioning unknown heretofore in the art.

A keyframe is a single frame which *summarizes* the shot, so that one may view representative keyframes instead of browsing through an entire video shoot (Ratakonda, column 1, lines 25-28. Ratakonda discloses an attempt to improve the keyframe by splitting same into several multiple level summaries, including a most compact summary, a coarse level summary, and a finest level summary with the first two summaries being subsets of the finest level summary. Thus, only the finest level summary needs to be decoded. From the most compact summary to the coarse level summary to the finest level summary, in Ratakonda there is not a plurality of temporal neighboring sub-entities, rather there is a difference in detail of each version of the keyword. Each summary level in Ratakonda cannot be said to have a level of homogeneity as do the micro-segments in the instantly claimed invention.

Applicants respectfully submit that the subset of a keyframe as disclosed by Ratakonda cannot be said to anticipate or obviate the micro-segments recited by instant claim 1. Claims 3, 6 and 7 are believed to be allowable for similar reasons as claim 1. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

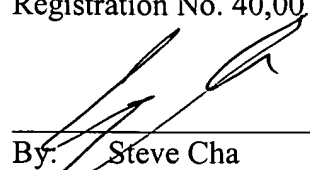
(3) Claim 8 stands rejected under 35 U.S.C. §103(a) over Ratakonda in view of Vaithilingam. Applicants also respectfully traverse this ground of rejection at least for its dependency on claim 6, which recites subject matter similar to that discussed above and believed to patentably distinguish from the combination of Ratakonda and Vaithilingam. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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Date: September 29, 2003

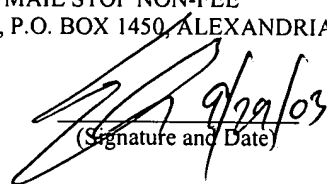
  
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